

5 Other Required NEPA/CEQA Considerations

5.0 OTHER REQUIRED NEPA/CEQA CONSIDERATIONS

5.1 INTRODUCTION TO ADDITIONAL NEPA/CEQA REQUIREMENTS DISCUSSED IN THIS SECTION

Both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) require analysis of significant irreversible changes. These include unavoidable impacts; irreversible and irretrievable commitment of resources; relationships between short-term uses and long-term productivity; and growth-inducing impacts. These are described in the following paragraphs.

5.2 ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT THAT CANNOT BE MITIGATED TO LESS THAN SIGNIFICANT

Effects on all resources were evaluated to determine any significant or unavoidable impacts. In general, most adverse impacts associated with the proposed Project are anticipated to be short-term and/or localized, and would be reduced to below their significance criteria by implementation of mitigation measures. Impacts and mitigation measures are identified and discussed throughout Chapter 4 of this report in their respective sections. A summary of all impacts and mitigation is provided in Table 6.1-1 in Chapter 6, "Conclusions and Recommendations."

Under the proposed Project, twenty impacts would be significant impacts that could not be mitigated to below their significance criteria. These impacts, which are considered to be major, permanent, long-term, or short-term impacts under NEPA and Class I impacts under the CEQA, are listed below. Due to the significant unavoidable impacts that would remain after mitigation is applied, approval of the Project would be subject to a Statement of Overriding Considerations under the CEQA.

- **Impact PS-2.** A high-energy collision of another vessel with the FSRU or an LNG carrier or an intentional attack could cause a rupture of the Moss tank(s) holding LNG, leading to a release of an unignited flammable vapor cloud that could extend beyond the 1,640-foot (500 m) radius safety zone around the FSRU, impact any members of the boating public in the identified potential impact area, and impact boats traveling in the Traffic Separation Scheme.
- **Impact PS-3.** Fishing gear could become hung up on the pipeline and potentially damage one or both of the subsea pipelines. Similar damage may occur due to a seismic event or subsea landslide.
- **Impact PS-4.** The potential exists for accidental or intentional damage to the onshore pipelines or valves carrying odorized natural gas. Damage, fires, and explosions may occur due to human error, equipment failure, natural phenomena (earthquake, landslide, etc.). This would result in the release of an odorized natural gas cloud at concentrations that are likely to be in the flammable range.
- **Impact PS-5.** In the event of an accident, there is a greater likelihood of injury, fatality, and property damage near Center Road Pipeline MP 4.1, an HCA.

- 1 • **Impact AES-3.** The FSRU would change the visual character of the ocean view
2 for recreational boaters.
- 3 • **Impact AGR-2.** Expansion of the Center Road Valve Station in Ventura County
4 would require conversion of approximately 0.1 acre (0.04 ha) of agricultural land
5 to non-agricultural uses.
- 6 • **Impact AIR-1.** Project construction activities in Ventura and Los Angeles
7 Counties would generate emissions that exceed quantitative thresholds for
8 criteria pollutants in designated air quality nonattainment areas.
- 9 • **Impact AIR-2.** Onshore Project construction activities would generate particulate
10 emissions that could cause or contribute to existing or projected violations of
11 ambient air quality standards.
- 12 • **Impact AIR-3.** An LNG spill from the FSRU or a pipeline rupture would result in
13 a natural gas release and/or a fire that could cause temporary increases in
14 ambient air concentrations of criteria pollutants in excess of air quality standards,
15 expose sensitive receptors and the general public to substantial concentrations
16 of toxic air contaminants, and/or create objectionable odors.
- 17 • **Impact AIR-5.** Emissions of NO_x and ROC generated from LNG carriers,
18 tugboats, and the crew/supply vessel operating in California Coastal Waters
19 could contribute to ambient ozone impacts in the areas located downwind of the
20 Project.
- 21 • **Impact BioMar-5.** Noise from construction and operation vessels or equipment
22 could disrupt migrations; interfere with or mask communications, prey and
23 predator detection, and/or navigation; cause adverse behavioral changes; or
24 result in temporary or permanent hearing loss
- 25 • **Impact BioMar-6.** An accidental release of a natural gas, fuel, or oil could cause
26 morbidity or mortality of marine biota, including fish, invertebrates, seabirds, and
27 special status species such as sea turtles, through direct contact or ingestion of
28 the material.
- 29 • **Impact BioMar-8.** A release of LNG, natural gas, fuel, or oil could cause injury
30 or mortality of marine mammals through direct contact or ingestion of the
31 material.
- 32 • **Impact NOI-2.** Recreational boaters and fishers at certain distances from the
33 facility could hear noise generated by FSRU operations over the long-term.
- 34 • **Impact NOI-3.** LNG carriers, crew boats and supply vessels, or helicopters
35 could temporarily increase noise levels for sensitive receptors, such as
36 recreational boaters and fishers.
- 37 • **Impact NOI-4.** HDB at the shore crossing and HDD or other drilling techniques
38 at onshore waterways and intersection crossings could temporarily increase
39 noise levels for sensitive receptors. Noise levels could exceed local noise
40 ordinances or permit conditions

- **Impact NOI-5.** HDB, HDD, boring, trenching, and other construction activities could temporarily create vibration levels at sensitive receptors
- **Impact NOI-6.** Site preparation, pipeline installation, and construction of aboveground facilities could temporarily increase noise levels for sensitive receptors, such as schools and residences. Noise levels may exceed county and/or city noise ordinances or permit conditions during the installation of the onshore pipeline and associated structures.
- **Impact REC-3.** The presence of the Project would alter the recreational experience of recreational boaters, including tourists and visitors on whale-watching trips and other visitors to the Channel Islands National Park.
- **Impact WAT-5b:** An accidental release of diesel fuel to marine waters violates Federal and State water quality standards or objectives.

5.3 RELATIONSHIP BETWEEN SHORT-TERM USES AND LONG-TERM PRODUCTIVITY

Effects on resources are often characterized with respect to their being of short- or long-term duration. This section highlights the broader relationships between short- and long-term effects and is not intended to repeat in-depth analyses provided in other chapters of this report. This section presents some of the tradeoffs in the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity of resources. In other words, an important consideration when analyzing the effects of a proposed project is to consider whether the project will result in short-term environmental effects, either adverse or beneficial, that would be detrimental to achieving long-term or maximum productivity of affected resources

Offshore, the installation and removal of mooring systems and pipelines would cause minor, localized effects that would be short-term in duration. If Project components were not removed after decommissioning, the impacts would be longer lasting. Upon completion of licensed activities, the marine environment would generally be expected to remain at or return to normal, long-term productivity levels.

Onshore, impacts would primarily be minor and short-term in duration, limited to the construction timeframe. For the most part, Project components would be installed within existing energy facilities, in existing road rights-of-way, or adjacent to existing pipeline infrastructure. Such areas are already dedicated to similar and same uses for the long-term; therefore, the Project would not have a different effect on the long-term productivity of resources in these areas.

The Project is not expected to enhance long-term productivity of resources in the Project Area or otherwise result in other environmental gains. The benefits of the proposed Project are principally those associated with an increase in the supply of natural gas for domestic consumption for the lifetime of the Project.

5.4 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

An irreversible or irretrievable commitment of resources refers to impacts on or losses to resources that cannot be recovered or reversed. Examples of such impacts would be the extinction of a species or permanent conversion of wetlands to open water. In scenarios, the loss of the existing resources is permanent.

The proposed Project would require an irretrievable commitment of natural resources from direct consumption of fossil fuels and construction materials. In addition, the purpose of the Project is to allow the burning of natural gas, an irreversible and irretrievable use of the gas resource. However, modern society is based on the consumption of fossil fuels, which will continue with or without the Project.

Some required operations activities could result in the destruction of marine life. Although there is a possibility that individual marine and terrestrial mammals, such as sea turtles, birds, and fish could be injured or killed, an irreversible or irretrievable effect on the overall species baseline populations is unlikely.

The accidental release of LNG at the DWP or of natural gas from the onshore facilities could result in irreversible damage either offshore or onshore.

5.5 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Per the CEQA (Section 15126.2(d)), this section discusses ways in which the proposed Project could foster economic or population growth or induce additional housing, either directly or indirectly, in the surrounding area.

Most projects could induce growth in areas they are located. The following criteria were considered to evaluate the growth-inducing potential of the Project.

Could the Project foster economic or population growth?

No. The Project area is currently served by numerous natural gas suppliers and economic activity is already in place. The demand for energy, as projected by the CEC, is due to existing customer demand and projected regional development. The Project, along with other energy projects, would increase the supply of natural gas to the region to meet this projected need for additional natural gas, but the Project in and of itself would not have induced the projected growth in demand for natural gas. Although the availability of a new or alternate source of natural gas could contribute to stimulating economic or population growth in the area, the natural gas supplied by Cabrillo Port would not be the sole supply of natural gas to the area. Therefore, the additional gas supplied by the proposed Project would not have intrinsic growth-inducing impacts.

Would the Project provide new employment?

Yes. However, the limited increase in employment is not expected to stimulate the construction of new housing that would result in physical impacts. Construction of the proposed Project would provide temporary employment for up to 200 workers for

1 approximately 35 days for the offshore pipelines. Construction of the offshore pipelines
2 would require up to 200 to 240 workers for approximately nine months.

3 The FSRU would have an operations crew of about 30 persons that would be rotated
4 from Port Hueneme every seven days. No new employees would be required to
5 operate the onshore pipelines.

6 *Would the Project provide access to undeveloped or underdeveloped areas?*

7 No. The Project would not involve the construction of new roads. The Project would
8 use existing rights-of-way and roads.

9 *Would the Project extend public service to a previously unserved area?*

10 No. The Project would not supply natural gas to any area that is previously unserved.
11 The primary result of the Project would be to meet increased energy demand from
12 existing customers.

13 *Would the Project tax existing community services?*

14 No. The number of non-local workers would be small relative to current population in
15 the Project area. Given that the additional local work force would be at most 60 workers
16 on alternating weekly work schedules, there would not be the need for new housing or
17 services. Local communities have sufficient infrastructure to meet the needs of non-
18 local workers.

19 *Would the Project cause development elsewhere?*

20 No. However, the purpose of the proposed Project is to meet anticipated baseload
21 energy demand from existing customers as well as new and expanding businesses
22 within the context of the Southern California economy.

23 **5.6 FLOODPLAIN MANAGEMENT EVALUATION**

24 The Federal Emergency Management Agency is responsible for delineating the limits of
25 flood plains based on topography and hydrology. The proposed Project would be
26 designed and installed in accordance with floodplain management regulations as they
27 apply to natural gas pipelines. Therefore, there would be no effect to floodplains or of
28 hazards associated with floodplains on the Project.

THIS PAGE INTENTIONALLY LEFT BLANK